SOUTHERN DISTRICT OF NEW YORK	X
THE NEW YORK TIMES COMPANY and CAITLIN H. DICKERSON,	: : : 19 Civ. 9017 (JLC)
Plaintiffs,	: : <u>MOTION TO</u>
-against-	: WITHDRAW AS COUNSEL
CUSTOMS AND BORDER PROTECTION,	: :
Defendant.	
	X

PLEASE TAKE NOTICE that, with consent of the Defendant, upon the accompanying Declaration of David E. McCraw, David E. McCraw hereby moves to withdraw as counsel for Plaintiff Caitlin H. Dickerson in the above-captioned action.

Laura R. Handman of Davis Wright Tremaine LLP has appeared as counsel for Plaintiff Caitlin H. Dickerson and will continue to represent her in this case.

Dated: New York, NY December 22, 2020

LINITED STATES DISTRICT COLIRT

Respectfully submitted,

By: /s/ David E. McCraw
DAVID E. MCCRAW
Deputy General Counsel
The New York Times Company
620 8th Avenue, 13<sup>th</sup> Floor
New York, NY 10018
Tel: (212) 556-4031

Fax: (212) 556-4634

Email: mccrad@nytimes.com

SO ORDERED:	
HONORABLE JAMES L. COTT	
LINITED STATES MACISTDATE HIDGE	

SOUTHERN DISTRICT OF NEW YORK	X	
THE NEW YORK TIMES COMPANY and CAITLIN H. DICKERSON,	: : :	19 Civ. 9017 (JLC)
Plaintiffs,	: :	
-against-	: :	
CUSTOMS AND BORDER PROTECTION,	: :	
Defendant.	: :	
	X	

LINITED STATES DISTRICT COLIRT

## **DECLARATION OF DAVID E. MCCRAW**

- I, David E. McCraw, hereby declare under penalty of perjury that the following is true and correct:
- 1. I am Deputy General Counsel at The New York Times Company ("The Times") and currently represent Plaintiffs The Times and Caitlin H. Dickerson in this matter.
  - 2. I make this declaration pursuant to Local Rule 1.4 of the Rules of this Court.
- 3. Plaintiff Caitlin H. Dickerson is no longer employed by The Times and will be joining The Atlantic in January of 2021. As a result, I am withdrawing as Ms. Dickerson's counsel in this matter.
- 5. Ms. Dickerson will now be represented by the law firm Davis Wright Tremaine LLP.
- 6. Attorneys at Davis Wright Tremaine LLP, including Laura R. Handman, appeared in this case on December 22, 2020.

- 7. My withdrawal will not affect any deadlines or cause any delay in this matter.
- 8. I am not asserting any retaining or charging lien on my client.

Dated: December 22, 2020 New York, New York

By: /s/ David E. McCraw
DAVID E. MCCRAW
Deputy General Counsel
The New York Times Company
620 8th Avenue, 13th Floor
New York, NY 10018

Tel: (212) 556-4031 Fax: (212) 556-4634

Email: mccrad@nytimes.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 22, 2020, I caused the foregoing Notice of Motion and Motion to Withdraw Appearance to be served on counsel of record for all parties via the Court's CM/ECF system.

Dated: December 22, 2020 New York, New York

By: /s/ David E. McCraw
DAVID E. MCCRAW
Deputy General Counsel
The New York Times Company
620 8th Avenue, 13th Floor
New York, NY 10018

Tel: (212) 556-4031 Fax: (212) 556-4634

Email: mccrad@nytimes.com